

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHELE METCALF, for herself and all others
similarly situated,

Plaintiff,

v.

TRANSPERFECT GLOBAL INC.,

Defendant.

Case No. 19-cv-10104 (AJN) (KHP)

DECLARATION OF DANIEL TURINSKY

DANIEL TURINSKY hereby declares as follows:

1. I am a partner with the firm of DLA Piper LLP (US), counsel for Defendant TransPerfect Global Inc. (“Defendant”) in this matter, and I am fully familiar with the facts set forth herein. I submit this declaration to transmit to the Court true and correct copies of the documents referenced in the accompanying Memorandum of Law in Support of Defendant’s Motion to Dismiss.

2. Attached hereto as Exhibit A is a true and accurate copy of the paystub of Plaintiff Michele Metcalf (“Plaintiff”) for the pay period from January 12, 2019, through January 25, 2019. Such paystub reflects that Plaintiff’s employer was TransPerfect Translations International Inc. (“TransPerfect Translations”), and not Defendant.

3. Attached hereto as Exhibit B is a true and accurate copy of a Life Cycle Form contained within Plaintiff’s personnel file, which reflects that the effective date of Plaintiff’s transfer from the New York City office of TransPerfect Translations to its Newport, California office was June 10, 2019.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
November 15, 2019.

/s:/ Daniel Turinsky
Daniel Turinsky, Esq.